1 MICHELE BECKWITH Acting United States Attorney 2 **EDUARDO PALOMO** Trial Attorney 3 DAVID GAPPA **Assistant United States Attorney** 2500 Tulare Street, Suite 4401 Fresno, CA 93721 5 Telephone: (559) 497-4000 Facsimile: (559) 497-4099 6 7 Attorneys for Plaintiff United States of America 8 9 UNITED STATES DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA 10 11 12 UNITED STATES OF AMERICA, Case No: 1:24-CR-00124-JAM-BAM 13 Plaintiff, STIPULATION FOR CONTINUANCE OF STATUS CONFERENCE; AND ORDER 14 v. PROPOSED DATE: May 28, 2025 15 TIME: 1:00 p.m. 16 THELMO MENESES SANTOS, JR., COURT: Hon. Barbara A. McAuliffe 17 Defendant. 18 19 20 Plaintiff United States of America, by and through its counsel of record, and defendant, by and 21 through defendant's counsel of record, stipulate as follows: 22 By previous order, this matter was set for a status conference hearing on March 12, 2025. 1. 23 The parties request additional time for preparation, investigation, and to discuss possible resolutions short 24 of trial. 25 2. By this stipulation, the parties agree that the next court date be on May 28, 2025. The 26 parties also agree to exclude time between March 12, 2025 and May 28, 2025, under 18 U.S.C. §§ 27 3161(h)(7)(A), (B)(iv).

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- 3. The parties agree, and request that the Court find the following:
- a. The defendant requests additional time for preparation, investigation, and to discuss possible resolutions short of trial. The parties have conferred by telephone on March 5, 2025 and the defendant does not object to the continuance.
- b. Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.
- c. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period from March 12, 2025 to May 28, 2025, inclusive, is deemed excludable under 18 U.S.C. §§ 3161(h)(7)(A), B(iv) because it results from a continuance granted by the Court at the request of the parties on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.
- 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

Dated: March 5, 2025	MICHELE BECKWITH
	Acting United States Attorney

/s/ Eduardo Palomo
Eduardo Palomo
Trial Attorney

/s/ David Gappa
David Gappa
Assistant U.S. Attorney

HEATHER E. WILLIAMS Federal Defender

/s/ Christina Corcoran
Christina Corcoran
COUNSEL FOR
THELMO SANTOS

Dated: March 5, 2025

ORDER

IT IS SO ORDERED that the status conference is continued from March 12, 2025, to May 28, 2025, at 1:00 p.m. in Courtroom 8 before Magistrate Judge Barbara A. McAuliffe. Time is excluded pursuant to 18 U.S.C.§ 3161(h)(7)(A), B(iv).

IT IS SO ORDERED.

Dated: March 5, 2025 /s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE